

Form G-8

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re _____)
)
) Bankruptcy No. _____
)
Debtor.) Chapter _____

COVER SHEET FOR APPLICATION FOR PROFESSIONAL COMPENSATION
(IN CASES UNDER CHAPTERS 7, 11 AND 12)

Name of Applicant: _____

Authorized to Provide Professional Services to: _____

Date of Order Authorizing Employment: _____

Period for Which Compensation is Sought:

From _____, _____ through _____, _____

Amount of Fees Sought: \$ _____

Amount of Expense Reimbursement Sought: \$ _____

This is an: Interim Application _____ Final Application _____

If this is *not* the first application filed herein by this professional, disclose as to all prior fee applications:

| <u>Date</u> | <u>Period</u> | <u>Total Requested</u> | <u>Total Allowed</u> | <u>Fees & Expenses</u> |
|--------------|----------------|------------------------------|------------------------------|----------------------------|
| <u>Filed</u> | <u>Covered</u> | <u>(Fees & Expenses)</u> | <u>(Fees & Expenses)</u> | <u>Previously Paid</u> |

Dated: _____

(Counsel)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-------------------|---|------------------------------------|
| IN RE: |) | |
| |) | CASE NO. 21-08585 |
| FLAVA WORKS, INC, |) | Chapter 11, Subchapter V |
| |) | |
| Debtor. |) | Honorable Judge Donald R. Cassling |

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on August 2, 2022 @ 10:00am. I will appear before the Honorable **Donald R. Cassling**, or any judge sitting in that judge's place, and present the motion of **FIRST AND FINAL APPLICATION FOR COMPENSATION OF SUBCHAPTER V TRUSTEE FOR THE DEBTOR AND REQUEST FOR AN EXPEDITED HEARING**, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, (1) use the link: <https://www.zoomgov.com/>; (2) Enter the meeting ID **161 414 7941**. (3) Enter Passcode: **619**

To appear by phone, (1) Call Zoom for Government at 1-669-254-5252 or 1-646-828-7666; (2) Enter the meeting ID **161 414 7941**. (3) Enter Passcode: **619**

Meeting ID and password. The meeting ID for this hearing is **161 414 7941** and the password is **619**. The meeting ID and password can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

/s/ Matthew Brash
Subchapter V Trustee

MATTHEW BRASH
Newpoint Advisors Corporation
5600 N. River Road
Suite 800
Rosemont, Illinois 60018
(847) 404-7845
mbrash@newpointadvisors.us

CERTIFICATE OF SERVICE

I, Matthew Brash, certify that I sent a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the Service List before or on July 29, 2022.

/s/ Matthew Brash
Subchapter V Trustee

MATTHEW BRASH
Newpoint Advisors Corporation
5600 N. River Road
Suite 800
Rosemont, Illinois 60018
(847) 404-7845
mbrash@newpointadvisors.us

SERVICE LIST
SEE ATTACHED

Label Matrix for local noticing
0752-1
Case 21-08585
Northern District of Illinois
Eastern Division
Mon Jul 25 16:28:06 CDT 2022

(p)BLAISE & NITSCHKE P.C.
145 S WELLS STREET
SUITE 1800
CHICAGO IL 60606-5161

Flava Works, Inc
Flava Works, Inc.
POB 2495
Chicago, IL 60690-2495

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

933 W Irving Park Corp
4444 W Montrose
Chicago IL 60641-2083

A4A Reseau
530 Rue Beaubien E
Montreal QC H2L 2W3 Canada

A4A Reseau, Inc.
Bruce Menkes, Mandell Menkes LLC
1 N. Franklin Street
Suite 3600
Chicago, IL 60606-3493

Aldo U Huitzil
53 W Jackson Blvd
Chicago IL 60604-3606

Department of the Treasury
Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

(p)ILLINOIS DEPARTMENT OF REVENUE
BANKRUPTCY UNIT
PO BOX 19035
SPRINGFIELD IL 62794-9035

Internal Revenue Service SB/SE
PO Box 7346
Philadelphia PA 19101-7346

(p)JOHN F BRADLEY
ATTN BRADLEY LEGAL GROUP P A
1217 E BROWARD BOULEVARD
FORT LAUDERDALE FL 33301-2133

Marques Rondale Gunter and SalsaIndy LLC
c/o Neal, Gerber & Eisenberg LLP
Attn: Robert Radasevich
Two N. LaSalle Street, Suite 1700
Chicago, IL 60602-4000

Neal, Gerber & Eisenberg
2 N LaSalle St Ste 1700
Chicago IL 60602-4000

Oscar Leiva
2132 W 23rd St
Chicago IL 60608-4002

Portratz & Associates
30 N LaSalle St 3200
Chicago IL 60602-3349

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Neal, Gerber & Eisenberg LLP
Two N. LaSalle Street, Suite 1700
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540 W. 35th St
Chicago, IL 60616-3532

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2476 Meadowdale Lane
Woodridge, IL 60517-3955

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Robert J Adams & Associates
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Chicago, IL 60616-3532

Matthew Brash
Newpoint Advisors Corporation
5600 N. River Road
Suite 800
Rosemont, IL 60018-5166

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Robert J Adams
Robert J Adams & Associates
540 W. 35th St., Ste. 100
Chicago, IL 60616-3532

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Blaise & Nitschke, P.C.
145 S. Wells Street
Suite 1800
Chicago, IL 60606

Illinois Department of Revenue
Bankruptcy Section, P.O. Box 19035
Springfield, IL 62794-9035

(d)Illinois Dept of Revenue
Bankruptcy Section
PO Box 19035
Springfield IL 62794

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

| | | |
|-----------------------------|-------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| (u)A4A Reseau, Inc. | (u)Marques Rondale Gunter | (u)SalsaIndy, LLC |
| (u)United States Of America | (u)Marques Rondale Gunter d/b/a Myvidster.com d/b/a Salsaindy LLC | End of Label Matrix Mailable recipients 22 Bypassed recipients 5 Total 27 |

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|--------------------------|---|-------------------------------------------|
| IN RE: |) | |
| |) | CASE NO. 21-08585 |
| FLAVA WORKS, INC, |) | Chapter 11, Subchapter V |
| |) | |
| Debtor. |) | Honorable Judge Donald R. Cassling |

**FIRST AND FINAL APPLICATION FOR COMPENSATION OF
SUBCHAPTER V TRUSTEE FOR DEBTOR AND REQUEST FOR AN
EXPEDITED HEARING**

Matthew Brash, not individually, but solely in his capacity as the Subchapter V Trustee (the “Trustee”) for the Debtor FLAVA WORKS, INC, (“Debtor”) pursuant to Section 330 of the Bankruptcy Code, applies to this Court for an order approving the payment of fees in the amount of \$7,227.50 plus expenses in the amount of \$44.44 for services rendered from September 15, 2021 through July 22, 2022 and in support thereof state as follows:

INTRODUCTION

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §157 and §1334. Venue is proper pursuant to 28 U.S.C. §§1408 and 1409. This matter is a core proceeding within the meaning of §157(b).

2. The basis for the requested relief is Section 330 of Title 11 of the United States Code (the “Bankruptcy Code” or the “Code”). FRBP 2016 and 9006(c)(1), and Rule 5082-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Illinois (the “Local Rules”).

BACKGROUND

3. On July 17, 2021 (the “Petition Date”), the Debtor filed a voluntary petition for relief under Chapter 11, Subchapter V of the United States Bankruptcy Code.

4. Matthew Brash was appointed as Subchapter V Trustee on September 15, 2021 (Docket No. 43).

5. During the Application Period, as more specifically described below, the Trustee was actively engaged in various aspects of this bankruptcy case, which included meeting with the Debtor and Debtor's counsel regularly via regular conference calls; reviewing the Debtor's financial performance; discussing the Debtor's plan and amended of reorganization ("Plan") and prospect for filing and obtaining approval for a consensual Plan with Debtor's counsel and Debtor's creditors, notably any secured creditors; reviewing, commenting and discussing the Debtor's proposed Plan with Debtor's counsel; discussing the Debtor's prospects for reorganization with the Office of the United States Trustee; and attending hearings in this Court, the Initial Debtor Interview and 341 Meeting of Creditors with the Debtor, Debtor's Counsel and United States Trustee.

6. This case will be dismissed or converted on or around the August 2, 2022, hearing. Therefore, the Trustee requests an expedited hearing on his fees.

REQUESTED RELIEF

7. Matthew Brash files this Application to be allowed as final compensation for work performed as Trustee during the Application period, and to authorize the Debtor to pay Matthew Brash the requested fees.

8. Attached as Exhibit A to this Application are the detailed chronological time entries by task of the Trustee describing the actual, necessary services rendered and time expended for work as Trustee during this Application period.

9. Attached as Exhibit B to this Application are the detailed expenses incurred by the Trustee during this Application period.

10. The Trustee's hourly rate is \$295 per hour. The Trustee's time entries are also logged in the following categories: (A) Case Administration, (B) Fee Application, (C) and Plan and Disclosure Statement. While there are some categories which overlap in subject matter, there is no duplication of time entries between categories.

PROFESSIONAL SERVICES RENDERED

11. During the Application Period, and as more specifically presented in Exhibit A, the Trustee performed the following services:

Category A: Case Administration: 18.0 Hours; \$5,310.00 in Fees:

This category includes the Trustee's review of filings including the Debtor's Bankruptcy Schedules, Monthly Operating Reports, budgets, Statement of Financial Affairs and all other pleadings filed; attending the Initial Debtor Interview, 341 Meeting of Creditors, court hearings and regular meetings and calls with the Debtor, Debtor's counsel and creditors to discuss the status of the case, specifically the filing of a consensual plan of reorganization on or before the 90-day deadline and amended plans as set by Debtor's Counsel and this Court.

Category B: Fee Application: 2 Hours; \$590.00 in Fees:

This category consists of the Trustee's preparation of the First and Final Application for Compensation of Subchapter V Trustee for Debtor.

Category C: Plan and Disclosure Statement: 4.5 Hours; \$1,327.50 in Fees:

This category includes the Trustee's review of the Debtor's plan via multiple telephone conferences with the Debtor's Counsel and attending hearings relating to the plan.

APPROPRIATENESS OF FEES

12. The total amount of allowed fees sought by the Trustee for professional services in this Application is \$7,227.50.

13. The professional services provided by the Trustee during the Application period were necessary and appropriate to guide the direction of the Debtor's case and were in the best interest of the Estate. In particular, the Trustee was in ongoing discussions with the Debtor and Debtor's counsel about their proposed plan (and amended plan) of reorganization. The Trustee also had regular discussions with various creditors regarding the Debtor's ability to present a feasible plan of reorganization and in the Trustee's best business judgment, creditors would most likely receive a greater distribution from a plan payment than a liquidation.

14. Compensation for the services provided by the Trustee is commensurate with the complexity, importance, and nature of the problems, issues and tasks involved. Matthew Brash undertook all reasonable efforts to ensure that the services provided were performed in an efficient manner, without duplication of effort.

15. The Trustee's fees and expenses billed were reasonable and represent the standard and customary billing rates in this area and the services rendered were necessary and beneficial to efforts to obtain confirmation of a plan of reorganization for the Debtor.

16. The Trustee's requested fees are awardable pursuant to Section 330 of the Bankruptcy Code as reasonable and necessary expenses incurred for the administration of the Estate.

WHEREFORE, Matthew Brash, Trustee requests entry of an order (i) allowing fees of \$7,227.50 plus expenses in the amount of \$44.44 for services rendered September 15, 2021 through July 22, 2022; (ii) authorizing the Debtor to immediately pay the Trustee allowed fees and

expenses in the amount of \$7,271.94 at this time; and (iii) providing such other an further relief as is proper and just.

Date: July 29, 2022

/s/ Matthew Brash
Subchapter V Trustee

Matthew Brash
Newpoint Advisors Corporation
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Rosemont, Illinois 60018
(847) 404-7845
mbrash@newpointadvisors.us